

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN

STEPHANIE GOETTL VANDER PAS,

Plaintiff,

v.

Case No. 21C1148

BOARD OF REGENTS OF THE
UNIVERSITY OF WISCONSIN SYSTEM,

Defendant.

SECOND DECLARATION OF RACHEL BACHHUBER

RACHEL BACHHUBER, pursuant to 28 U.S.C. § 1746, declares as follows:

1. I am an attorney licensed to practice law within the State of Wisconsin and am employed by the Wisconsin Department of Justice as an Assistant Attorney General. I am counsel of record for the Defendant Board of Regents of the University of Wisconsin System (the Board) in this case. I make this declaration based on my review of the Department of Justice file and based on my personal knowledge.

2. Today, March 3, 2023 at 3:41 p.m., Attorney Lisle Blackburn emailed Defendant's counsel, including me, abandoning his previous agreement to provide feedback and disputes to Defendant's proposed statement of facts by today, stating he would now provide response by March 17, and unilaterally concluding Defendant would not be prejudiced by this further delay. Attorney Lisle Blackburn further stated that Plaintiff will not attend a clinical interview with Defendant's expert because Defendant was unable to disclose the expert by February 3, 2023. Attached

and marked as **Exhibit 1124** is a true and correct copy of Attorney Blackburn's email.

3. Attached and marked as **Exhibit 1125** is a true and correct copy of an email from Plaintiff's counsel, Attorney Lisle Blackburn, to Defendant's counsel, including me, dated January 13, 2023.

Pursuant to 28 U.S.C. § 1746, I verify under penalty of perjury that the foregoing is true and correct.

Executed on March 3, 2023.

s/Rachel Bachhuber
RACHEL BACHHUBER